

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

SCOTT KOHELL,

Defendant.

) UNDER SEAL

)

) Criminal No. 2:24-cr-110

)

) 18 U.S.C. § 2252(a)(4)(B)

) Possession of Images of Minors Engaging

) in Sexually Explicit Conduct

) (Count 1)

)

) 18 U.S.C. § 2253

) Criminal Forfeiture

INDICTMENT

September 2024 Term -- At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Possession of Images of Minors Engaging in Sexually Explicit Conduct)

From on or about April 10, 2023, to June 6, 2023, in the Eastern District of Virginia, and elsewhere, the defendant SCOTT KOHELL, did knowingly possess a Dropbox account associated with the email address ramon.camacho80@icloud.com, which contained a visual depiction that had been mailed, and had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed and so shipped and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B)).

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

A. Defendant SCOTT KOHELL, upon conviction of any of the offenses charged in this Indictment, as part of the sentencing of the defendant pursuant to Fed.R.Crim.P. 32.2, shall forfeit to the United States:

1. Any and all matter which contains child pornography, or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, distributed or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

2. Any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property; and

3. Any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*.

B. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

C. The property subject to forfeiture includes, but is not limited to, the following items:

1. Green, iPhone Pro.

(All pursuant to Title 18, United States Code, Section 2253; and Title 21, United States Code, Section 853(p).)

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

United States v. Kochell, 2:24-cr 116

A TRUE BILL:

REDACTED COPY

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By:



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